

David A. Craymer
Vice President - Power Generation System Operations

Dominion Virginia Power • Dominion North Carolina Power
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June 3, 2016

VIA EMAIL and OVERNIGHT MAIL

Mr. Chad D. Harsh (harsh.chad@epa.gov)
NPDES Enforcement Branch (3WP42)
Water Protection Division
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RE: EPA Information Requirement, Clean Water Act Section 308 (April 15, 2016): Virginia Electric and Power Company, Possum Point Power Station – Second Supplemental Response

Dear Mr. Harsh:

Virginia Electric and Power Company d/b/a Dominion Virginia Power ("Dominion") provided an initial response to the above-referenced Information Requirement on May 3, 2016. As agreed to by EPA, Dominion submitted a first supplemental response on May 27. As further agreed to by EPA, Dominion is submitting this second supplemental response by June 3 to provide all additional responsive information contained in e-mail.

Responsive e-mail and attachments are provided on the enclosed disk. Also enclosed is an index identifying the numbered request(s) to which each document is responsive and a log identifying responsive information subject to a claim of legal privilege. As EPA is aware, in September 2014, Dominion received a 60-day notice of intent to sue from the Potomac Riverkeeper and Sierra Club, through their counsel Southern Environmental Law Center, regarding alleged violations of the Clean Water Act at the Possum Point Power Station. A legal hold is in place in connection with that threatened lawsuit, and you will see from the privilege log that a considerable amount of work product has been generated. Needless to say, Dominion vigorously disagrees with the allegations made in the 60-day notice of intent to sue.

In accordance with Instruction No. 5, the documents in this second supplemental response, as well as our initial and first supplemental responses, relate primarily to environmental and engineering matters. Dates, authors and addressees are included, where applicable. All documents produced in this and our prior submittals are maintained in an electronic database that will be preserved throughout EPA's review process.

In accordance with Instruction No. 7, the following individuals provided documents responsive to the Information Requirement:

Dominion Environmental Services

Ken Roller, Supervisor, Environmental Regulations (lead custodian)
Cathy Taylor, Senior Environmental & Sustainability Advisor
Jason Williams, Manager, Generation Environmental Services
Oula Shehab-Dandan, Environmental Consultant
Amelia Boschen, Environmental Specialist

Dominion Power Generation Engineering

Doug Wight, Manager, Power Generation Engineering (lead custodian)
Michael Winters, Engineer
John Cima, Consulting Engineer
Frank Brayton, Director, Power Generation Engineering

Dominion Generation Projects

Christine Harris, Director, Generation Projects
Michael Glagola, Project Manager

Dominion Power Generation Operations

Jeffrey Heffelman, Possum Point Station Director
Jeffrey Marcell, Possum Point Environmental Compliance Coordinator
David Craymer, VP, Power Generation System Operations

Other than Mr. Heffelman and Mr. Marcell, who are located at the Possum Point Power Station, 19000 Possum Point Rd., Dumfries, VA, the custodians listed above are located at the Innsbrook Technical Center, 5000 Dominion Blvd., Glen Allen, VA. All custodians may be contacted through Cathy Taylor at (804) 273-2929.

The following internal and external counsel assisted with compilation and preparation of Dominion's initial, first supplemental, and second supplemental responses:

Clay Burns
Senior Counsel
Dominion Resources Services, Inc.
120 Tredegar St.
Richmond, VA 23219
(804) 819-2278

Brooks M. Smith
Troutman Sanders LLP
1001 Haxall Point

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Richmond, VA 23219
(804) 697-1414

Dominion wishes to provide a brief explanation of its efforts to obtain and produce responsive information, and appreciates EPA's allowance of additional time to provide a complete response. First, all Dominion employees reasonably expected to have responsive information were identified, and efforts began to understand the scope and location of potentially responsive documents. The lead custodians then helped compile the primary narrative responses and key responsive documents submitted on May 3. Next, each custodian compiled all additional responsive documents not otherwise stored in e-mail format, which were provided on May 27.

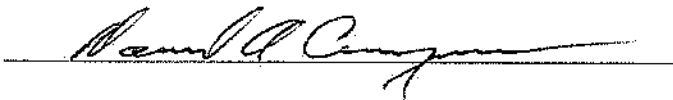
During this time, Dominion's IT department and external counsel coordinated production of potentially responsive e-mails for each of the identified custodians. That effort required significant lead time and effort to secure the e-mail and narrow potentially responsive information. Over 3,000 emails ultimately were reviewed for responsiveness and to identify which were subject to a legal privilege. In order to limit the volume of duplicative content produced from email strings, email-threading technology was used to produce only the last-in-time emails and attachments from email strings. As part of this process, care was taken to ensure that messages and attachments excluded from production are contained and reviewable within the later-in-time emails and attachments that are included on the disk.

The information herein and on the enclosed disk represent Dominion's ongoing good faith efforts to provide available, responsive, non-privileged documentation and information in its possession. This submission is made without waiver of any objections, defenses or other rights and should not be construed as an admission of any kind. Any inadvertent disclosure by Dominion of material protected by privilege is not intended, and should not be construed to constitute a waiver of such privilege. Dominion reserves the right to amend or supplement its response to provide additional relevant documents that later become known or available. Dominion is not waiving its right to object to authentication of the documents produced for the purpose of admissibility in any administrative or judicial proceeding.

Given the significant amount of documents we have produced in response to the Information Requirement, Dominion would be happy to meet with you to discuss our responses and any additional questions EPA may have about the coal ash impoundments at Possum Point. Otherwise, should you have any questions regarding our responses, please contact Cathy Taylor at (804) 273-2929 or cathy.c.taylor@dom.com.

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I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



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Enclosures

cc: Pamela F. Faggert
Cathy C. Taylor
Brooks M. Smith, Esq.